

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**FILED**

**AUG 26 2015**

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

RODNEY KEITH JONES, and  
CHARLES FLOWERS,

Defendants.

No.

**4:15CR403 HEA/SPM**

**INDICTMENT**

**COUNT I**

The Grand Jury charges that:

Beginning in or about September 2013, with the exact date unknown, in the Eastern District of Missouri, and elsewhere, the defendants,

**RODNEY KEITH JONES and CHARLES FLOWERS,**

did knowingly and intentionally combine, conspire, confederate, and agree, together with one or more other persons, whose identities are known and unknown to the Grand Jury, to commit the following offenses against the United States: to knowingly and intentionally distribute and possess with the intent to distribute a mixture or substance containing a detectable amount of heroin, Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846.

The amount of heroin involved in the offense and attributable to each defendant by virtue of his own conduct and the conduct of co-conspirators reasonably foreseeable to him is in excess

of 100 grams, making the offense punishable under Title 21, United States Code, Section 841(b)(1)(B)(i).

A TRUE BILL.

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FOREPERSON

RICHARD G. CALLAHAN  
United States Attorney

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SIRENA MILLER WISSLER #55374MO  
Assistant United States Attorney